



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUL 13 2011

REPLY TO THE ATTENTION OF:

Andrew Stewart
Chief
Wisconsin Department of Natural Resources
Bureau of Air Management
101 South Webster Street
Box 7921
Madison, Wisconsin 53707

Re: CONSTRUCTION PERMIT NO.: 09-DCF-251-R1 & OPERATION PERMIT NO:
816116730-P02 (P01)

Dear Mr. Stewart,

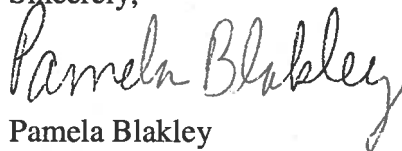
Thank you for the opportunity to comment on the draft permit for Specialty Mineral Inc. (SMI) located in Douglas County, Wisconsin. The U.S. Environmental Protection Agency has the following comments:

- Section B.1:
 1. The emission limits and test methods for Particulate Matter (PM), PM10 and PM2.5 are not specifically identified in the permit. It is also not clear what form of particulate matter the Best Available Control Technology (BACT) limit applies to. Please clarify.
 2. Initial testing for the finishing carbonator is required 90 days after initial operation; however it does not require a testing schedule beyond that. Please provide explanation.
 3. The testing requirement for the finishing carbonator does not specify what form of particulate SMI is testing for. Please clarify.
 4. What monitoring method is being used to ensure compliance? There are requirements for visible emission checks; however it is unclear that visual checks will be able to determine if the facility is operating in compliance with its BACT limit. Please provide discussion on how monitoring is sufficient to ensure compliance with the limits. It is not clear if operating parameters are to be established during stack testing for any parametric monitoring which may be used to ensure ongoing compliance with BACT limits.

- Section B.3:
 1. The 1-hour SO₂ NAAQS standard became effective on August 23, 2010. Please provide an explanation as to why this project would be protective of the 1-hour SO₂ NAAQS.
- Section B.4:
 1. Please clarify if the facility can change its method of determining compliance at anytime. The permit is open ended and does not indicate whether the chosen method of compliance will be incorporated later on.
- Section B.6:
 1. Please clarify the monitoring method and record keeping used to determine ongoing compliance with BACT and Latest Achievable Control Techniques limits.
 2. There are no testing requirements for VOC after initial startup nor is there a schedule for testing. Please provide explanation.
- Section B.7:
 1. Please clarify what monitoring method and record keeping requirements are being used to determine ongoing compliance with the BACT and Lowest Achievable Emission Rate limits.

If you have any questions or would like to discuss the comments listed, please contact Charmagne Ackerman, of my staff, at (312) 886-0448.

Sincerely,



Pamela Blakley
Chief
Air Permits Section